

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

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MDL NO. MD-15-02641-PHX-DGC
CIVIL ACTION NO. 2:18-cv-04614

Morgan v. C.R. Bard, Inc. et al.

MOTION

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Plaintiff, Darline Dianne Allen Morgan, by and through her attorneys respectfully seek leave of Court to file an Amended Short Form Complaint in this matter for the reasons set forth below:

The original suit was filed in this matter based upon the belief that Plaintiff's legal name was Darlene Dianne Morgan. Her original suit was filed on December 11th, 2018.

Subsequent to the filing of her original lawsuit, it was learned that Plaintiff's full legal name is instead Darline Dianne Allen Morgan.

Under Federal Rule of Civil Procedure 15(a), leave of court to amend a petition should be freely given when justice so requires. The only change is to correct the scrivener's error in the Short Form Complaint in the above captioned matter. No party will be prejudiced by this change. It is hereby requested that this Motion for Leave to File Amended Short Form Complaint be granted.

Dated: January 16, 2019

MCSWEENEY/LANGEVIN

/s/ David M. Langevin

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